

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BARRY C. HONIG, GRQ CONSULTANTS, INC., GRQ CONSULTANTS, INC. 401K, GRQ CONSULTANTS, INC. ROTH 401K FBO BARRY HONIG, GRQ CONSULTANTS, INC. ROTH 401K FBO RENEE HONIG, HS CONTRARIAN INVESTMENTS, LLC, ROBERT S. COLMAN, and ROBERT S. COLMAN TRUST UDT 3/13/85,

Plaintiffs,

v.

JOHN DAVID HANSEN and GREGORY P. HANSON,

Defendants.

Case No. 1:20-cv-05872-AKH (Lead Case)

GRANDER HOLDINGS, INC., GRANDER HOLDINGS, INC. 401K PSP, BRAUSER FAMILY TRUST 2008, MICHAEL BRAUSER, DANIEL BRAUSER, BENJAMIN BRAUSER, GREGORY BRAUSER, and JOSHUA BRAUSER,

Plaintiffs,

v.

JOHN DAVID HANSEN and GREGORY P. HANSON,

Defendants.

Case No. 1:20-cv-08618-AKH

DECLARATION OF ROBERT D. WEBER IN SUPPORT OF THE COLMAN-HONIG PLAINTIFFS' MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

I, Robert D. Weber, declare as follows:

1. I am a partner of the law firm Sheppard, Mullin, Richter & Hampton LLP, counsel for Plaintiffs Barry C. Honig, GRQ Consultants, Inc., GRQ Consultants, Inc. 401K, GRQ Consultants, Inc. Roth 401K FBO Barry Honig, GRQ Consultants, Inc. Roth 401K FBO Renee Honig, HS Contrarian Investments, LLC, Robert S. Colman, and Robert S. Colman Trust UDT 3/13/85 (collectively, the "**Colman-Honig Plaintiffs**"). I make this declaration in support of the Colman-Honig Plaintiffs' Motion for Leave to File an Amended Complaint. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto.

2. Attached hereto as Exhibit A is a true and correct copy of the Colman-Honig Plaintiffs' Proposed Fifth Amended Complaint.

3. Attached hereto as Exhibit B is a redline showing the revisions from the Colman-Honig Plaintiffs' operative Fourth Amended Complaint (No. 1:20-cv-05872, ECF No. 122) to their Proposed Fifth Amended Complaint (Exhibit A).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at Los Angeles, California, this 25th day of May, 2022.

A handwritten signature in black ink, appearing to read "Robert D. Weber", is written over a light gray rectangular background.

ROBERT D. WEBER